

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

	)	
ELMAGIN CAPITAL LLC,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 2:20-cv-02576-TJS
v.	)	
	)	JURY TRIAL DEMANDED
CHAO CHEN, KARL PETTY,	)	
ENTERGRID LLC, and	)	
ENTERGRID FUND I LLC	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS’ UPDATED PRE-TRIAL MEMORANDUM**

Pursuant to the Court’s Scheduling Order of September 8, 2021, and the Court’s Order of March 28, 2022, Defendants Chao Chen, Karl Petty, Entergrid LLC, and Entergrid Fund I LLC (collectively “Defendants” or “Entergrid”) hereby submit this Updated Pretrial Memorandum. Defendants expressly reserve the right to amend and/or supplement their pre-trial memorandum, in particular their expected objections to any lay opinion testimony expected to be offered by Plaintiff, following Plaintiff’s disclosure of witnesses in its own pre-trial memorandum.

**I. Identity of each expert witness to be called at trial by Defendants with a summary of the expert’s opinions**

**A. Cristian Zarcu**

Mr. Zarcu is expected to provide expert testimony concerning his opinions that:

- Entergrid and Elmagin each trade in various wholesale electricity markets, including those run by the PJM Interconnection and the Midcontinent Independent System Operator.

- Algorithmic trading is “the trading of securities based strictly on the buy/sell decisions of computer algorithms.” Trading algorithms are defined sets of instructions that allow traders to place trades into the marketplace, typically designed based on evaluating the performance of a proposed algorithm on historical data. Most trading algorithms draw their inputs from a broad range of historical information, including historical trade volume, average trade size, standard deviation of trade size, and volatility of prices or returns.
- Details matter in algorithm implementation. Algorithmic trading strategies can and do exist that are all based on the same principle but differ in their implementation. Mr. Zarcu has designed and implemented three different algorithmic trading platforms, with very similar offerings, built on the same fundamentals of trading. Yet the actual algorithms were different between the three platforms.
- Some proprietary algorithms are so-called “market-making” strategies and operate by quoting a buy and sell price for an asset, increasing liquidity in the market. Market-making strategies do not make a directional bet on where prices will move. Other proprietary algorithms are based on directional bets on how prices will move, such as trend-following strategies or mean reversion strategies. Techniques for portfolio construction based on asset volatility are widely used across all asset types.
- Algorithmic trading in FTRs can be understood by applying general principles of algorithmic trading. Applying these principles, any financial trader that wants to participate in an FTR auction must decide which FTRs to bid for, how much to demand, and what price to submit. After deciding what auction to participate in

and what overall set of FTRs to bid for, an algorithmic trader will base its choice of which specific FTRs (in the overall set) to bid for, what price to submit, and what quantity to demand based partly or completely on algorithms.

- General overviews of the at-issue strategies, based on interrogatories and testimony, including that Elmagin and Entergrid trade using two kinds of strategies: market-making strategies and directional strategies. Comparing the market-making strategies and the directional strategies across companies, while they seem to have similar components, the descriptions on the record and the data work that he conducted show that there are differences as well. Based on his experience as an algorithmic trader, the similarities between these strategies arise from the application of elementary finance techniques, such as moving averages, or techniques widely used by participants in electricity markets, such as shift factors.

a. To the extent there are any high-level similarities between Elmagin's market-making strategy of Breck and Entergrid's Gryphon, Hydra, and Ziggi, they are based on the application of widely used, elementary financial principles. The differences, even based on a high-level description, are substantial: Only Elmagin holds FTRs for multiple months and uses 'minimum spanning trees.'

b. To the extent there are any high-level similarities between Elmagin's directional strategies of Faber and Chloe and Entergrid's Yogi, Uma, and Tuva, they are based on the application of widely used, elementary financial principles. The differences, even based on a high-level description, are substantial: Only Elmagin holds FTRs for multiple months and uses minimum spanning trees.

- The similarities between Entergrid and Elmagin’s trading strategies come from widely used, elementary principles that would be known to reasonably sophisticated algorithmic trading practitioners.

a. While review of evidence indicates that Entergrid does not use minimum spanning trees, that technique and others for FTR path identification are well-known methods to achieve the goal of connecting all nodes in a grid with minimal cost. It is inconsistent with my experience as an algorithmic trader to consider the idea of using minimum spanning trees, separated from any implementation details, as proprietary.

b. Congestion (and thus FTR value) is created by power flowing through binding constraints. Selecting FTRs based on target constraints is also a natural outcome of applying algorithmic, rules-based thinking to FTR trading.

c. Identifying the FTRs with highest correlation to the source of the return (the “target constraint”) and lowest possible correlation to other constraints is an application of basic principles of diversification in portfolio construction.

d. Analyzing the clustering or overlap of FTRs and their exposure to binding constraints is a natural final step in portfolio construction, based on elementary principles of portfolio construction.

e. The use of a simple equally-weighted average of recent prices is a convenient technique that is simple to implement and is a natural extension of more complex models that allows for quick and efficient testing and optimization. This is one among a wide variety of possible time-horizons used in forecasting electricity

prices. It is also fundamental and widely used among algorithmic traders in other assets, including in examples that described in his report.

f. In his experience as an algorithmic trader, the insight of taking two possible price forecasts and testing whether the difference can generate a profit opportunity is a very basic one. This principle underlies a number of widely used, elementary algorithmic trading strategies, including in examples that describe in his report.

## **B. Maria Garibotti**

Dr. Garibotti is expected to provide expert testimony concerning her opinions that:

- Dr. Pirrong has not conducted any proper economic or other scientific analysis to show that Entergrid's strategies are "functionally identical" or "highly similar" to Elmagin's strategies. In deposition he offered the economic test for substitutability. Should he offer this test again at trial, two goods being close substitutes reflects first and foremost how consumers see them and make economic decisions. Based on his report and deposition, Dr. Pirrong has not conducted any analysis of demand for Entergrid's and Elmagin's strategies, and thus he has no basis to assert that these strategies are close substitutes in the way this term is used in economics and in antitrust analysis.
- Dr. Pirrong blindly adopts Elmagin's Bid Data Analysis performed by Mr. Yuros. Dr. Pirrong acknowledges that he has neither seen the underlying code nor any other support for Elmagin's Bid Data Analysis, nor reviewed Mr. Yuros' deposition. Dr. Pirrong misinterprets Elmagin's Bid Data Analysis, and ignores

numerous flaws that render its conclusions, as well as the opinions that Dr. Pirong draws from it, unscientific and unreliable.

**C. W. Anthony (“Tony”) Mason**

Mr. Mason is expected to provide expert testimony concerning his opinions that:

- The code bases provided by Elmagin and Entergrid (through their respective counsel) for review are substantially different in terms of the manner in which they are implemented and the way in which they model the problems they address.
- The code bases provided by Elmagin and Entergrid do contain some similarities. However, after examining the similarities, those similarities generally appear to be mechanistic. For example, both code bases ingest information from multiple publicly or commercially available sources that are the same or similar to one another. Thus both code bases contain code that can read and process those similar elements.
- The algorithms implemented in the code bases provided by Elmagin and Entergrid are similar in some ways for two reasons. First, both are attempting to solve a similar problem: the development of a successful (i.e., profitable) strategy for Financial Transmission Right (FTR) trading. Second, both utilize standard statistical techniques for analyzing a “space” (or universe) of potential solutions that is too large for exhaustive testing.
- The two systems (as embodied in the code provided) do not appear to share code lineage aside from the use of some widely available and used code libraries. The techniques these code bases are widely and frequently used across many domains,

including financial trading. Unique aspects of the Elmagin code base do not map to any corresponding portion of the Entergrid code.

- As part of his evaluation of the Entergrid code, he attempted to identify particular techniques in the Entergrid code that are not based upon techniques that he had seen discussed in readily available materials about FTR trading. He was unable to identify any such code. Entergrid's code merely uses standard Python libraries to implement FTR trading techniques. Despite his efforts in keeping with the professional standards of computer science to do so, he was unable to find any Entergrid code that embodied anything that, in his opinion, is not widely used and fundamental in computer programming.

**II. Identity of each fact witness to be called at trial by Defendants, in support of Defendants' case-in-chief, with a concise statement of the nature and substance of the expected testimony**

**A. Chao Chen**

Dr. Chen is expected to provide testimony regarding

- His education, background, and career,
- Entergrid's independent creation of Entergrid's trading strategies,
- His compliance at all times with his contractual obligations to Elmagin,
- His recollections of how Elmagin's trading strategies operated at the time he left Elmagin,
- How Entergrid's trading strategies differ from Elmagin's,
- Defendants' non-use of any trade secrets or confidential information that Dr. Chen knew or should have known to have been proprietary to Elmagin,

- Whether the elements of algorithmic trading strategies are elementary and widely used,
- His separation from Elmagin,
- Elmagin's value,
- The project he asked Dr. Petty to work on for Elmagin
- The extent of Elmagin confidential information to which Dr. Petty was ever exposed,
- his background knowledge as an experienced algorithmic trader in wholesale energy markets at the time he began independently developing Entergrid's trading strategies.

**B. Karl Petty**

Dr. Petty is expected to provide testimony regarding

- His education, background, and career,
- Entergrid's independent creation of Entergrid's trading strategies,
- The project that he was asked to work on for Elmagin and what tasks, if any, he did
- The limited amount of largely unrelated Elmagin confidential information to which he briefly had access,
- That he spent only approximately five hours of time reviewing Elmagin's information in 2016, did not invoice Elmagin for that time and received no payment for that time,
- His compliance at all times with his contractual obligations to Elmagin, and



- Defendants' non-use of any trade secrets or confidential information that Dr. Petty knew or should have known to have been proprietary to Elmagin.

**C. Jay Tian**

Mr. Tian is expected to provide testimony, by designation, regarding

- His background and career, and
- Entergrid's trading strategies and their development.

**D. Richard Gates**

If Plaintiff does not call Richard Gates or if Plaintiff does call him but the following areas are not within the scope of cross-examination, Defendants may call Mr. Gates to testify as a hostile witness regarding:

- Elmagin's trading strategies and their elements,
- Elmagin's trading results,
- What Elmagin considers to be its trade secrets,
- His education, background, and career,
- TFS's formation, business and history,
- Elmagin's formation, business and history,
- Elmagin's management organization and philosophy,
- The relationship between Elmagin and TFS,
- Dr. Chen's career at Elmagin and TFS,
- The knowledge, skills and experience that Dr. Chen brought with him to Elmagin/TFS,
- TFS's technical sophistication prior to Dr. Chen's joining TFS,
- Dr. Chen's impact on Elmagin/TFS's technical sophistication and capabilities,

- The status of Elmagin's trading strategies at the time of Dr. Chen's departure,
- His and Elmagin's lack of familiarity with algorithmic trading outside the confines of Elmagin/TFS,
- His lack of knowledge concerning Elmagin's trading strategies,
- Elmagin's emphasis on confidentiality as to all business matters,
- Dr. Chen's departure from Elmagin, including negotiations with Dr. Chen and requiring Dr. Chen to remain with Elmagin for an additional year in exchange for a one year non-compete,
- Elmagin's enforcement of the non-compete clause during its one-year term,
- The value of Elmagin and its funds,
- Elmagin's funds under management and their origins,
- His understanding of the Elmagin's (and his) agreements with Dr. Chen and Dr. Petty, and
- Elmagin's non-use of Dr. Petty's services.

#### **E. Kevin Gates**

If Plaintiff does not call Kevin Gates or if Plaintiff does call him but the following areas are not within the scope of cross-examination, Defendants may call Mr. Gates to testify as a hostile witness regarding

- Elmagin's trading strategies and their elements,
- Elmagin's trading results,
- What Elmagin considers to be its trade secrets,
- His education, background, and career,
- TFS's formation, business and history,

- Elmagin's formation, business and history,
- Elmagin's management organization and philosophy,
- The relationship between Elmagin and TFS,
- Dr. Chen's career at Elmagin and TFS,
- Dr. Chen's departure from Elmagin,
- The knowledge, skills and experience that Dr. Chen brought with him to Elmagin/TFS,
- TFS's technical sophistication prior to Dr. Chen's joining TFS,
- Dr. Chen's impact on Elmagin/TFS's technical sophistication and capabilities,
- The status of Elmagin's trading strategies at the time of Dr. Chen's departure,
- His and Elmagin's lack of familiarity with algorithmic trading outside the confines of Elmagin/TFS,
- His lack of knowledge concerning Elmagin's trading strategies,
- Elmagin's emphasis on confidentiality as to all business matters,
- Dr. Chen's departure from Elmagin, including negotiations with Dr. Chen and requiring Dr. Chen to remain with Elmagin for an additional year in exchange for a one year non-compete,
- Elmagin's enforcement of the non-compete clause during its one-year term,
- The value of Elmagin and its funds,
- Elmagin's funds under management and their origins,
- Elmagin's non-use of Dr. Petty's services,
- His understanding of the Elmagin's (and his) agreements with Dr. Chen and Dr. Petty,

- His understanding that Dr. Chen was allowed to use all the elements identified in Plaintiff's interrogatory answers.

#### **F. Roger Chiang**

If Plaintiff does not call Roger Chiang or if Plaintiff does call him but the following areas are not within the scope of cross-examination, Defendants may call Mr. Chiang to testify as a hostile witness regarding:

- Elmagin's trading strategies and their elements,
- Elmagin's trading results,
- What Elmagin considers to be its trade secrets,
- His education, background, and career,
- His experience with algorithmic trading prior to joining Elmagin,
- Whether the elements of trading strategies are elementary and widely used,
- The level of knowledge required to replicate Elmagin's trading strategies and his inability to recreate Elmagin's trading strategies based on Elmagin's evidentiary presentation, and
- The status of Elmagin's trading strategies at the time of Dr. Chen's departure from Elmagin.

#### **G. Guidong Zhu**

If Plaintiff does not call Guidong Zhu or if Plaintiff does call him but the following areas are not within the scope of cross-examination, Defendants may call Mr. Zhu to testify as a hostile witness regarding:

- Elmagin's trading strategies and their elements,
- Elmagin's trading results,

- What Elmagin considers to be its trade secrets,
- His education, background, and career,
- The development of Faber and his and Dr. Chen's participation therein,
- The evolution of Faber before and after Dr. Chen's departure
- Availability of data concerning electric transmission to market participants,
- Availability of models and modelling software to market participants,
- Whether techniques used in Elmagin's trading strategies are elementary and widely used.

#### **H. Matt Yuros**

If Plaintiff does not call Matt Yuros or if Plaintiff does call him but the following areas are not within the scope of cross-examination, Defendants may call Mr. Yuros to testify as a hostile witness regarding:

- Elmagin's trading strategies and their elements,
- Elmagin's trading results,
- What Elmagin considers to be its trade secrets,
- His education, background, and career,
- His experience with algorithmic trading prior to joining Elmagin/TFS,
- Whether the elements of trading strategies are elementary and widely used,
- His evaluations of Elmagin's trading strategies before, at and after the time of Dr. Chen's departure,
- His investigation of Entergrid's trading strategies, including its originations and his motivations,

- His analysis purportedly comparing the results of Entergrid's trading strategies to Elmagin's trading strategies

Defendants reserve the right to present deposition testimony, either by videotape or by reading excerpts from the transcripts of their depositions to the trier of fact of the foregoing hostile witnesses and/or witnesses not within the subpoena power of the Court and/or otherwise unavailable for trial. Defendants also reserve the right to call other witnesses as rebuttal to witnesses presented by Elmagin. Defendants reserve the right to call a witness not listed above if necessary to authenticate a document on their exhibit list. Defendants also reserve the right to call any witnesses listed in Elmagin's Pretrial Memoranda.

**III. Designations of written or video testimony to be offered at trial, including citations by page and line number**

Please see Appendix A hereto.

**IV. Itemized statement of damages or other relief**

Defendants request reasonable attorney's fees pursuant to 18 U.S.C. § 1836(b)(3)(D) and 12 Pa. C.S. § 5305(1). Plaintiff's assertion of trade secrets was made in bad faith. Plaintiff has been unwilling and/or unable to define its alleged trade secrets with the requisite specificity at any point during this litigation, and has likewise been unwilling and/or unable to delineate its alleged trade secrets from what is generally known to or readily ascertainable by algorithmic traders in the wholesale energy markets.

**V. Statement of any anticipated important legal issues which will require a ruling, along with single best authority on each such issue**

Defendants here list those issues that Defendants anticipate will require the Court to rule on during or after trial, whether in the form of a motion under Rule 50 or 59 or in conjunction with jury instructions.

A. Whether Elmagin has adequately delineated each of its alleged trade secrets from the matters generally known to or readily ascertainable by reasonably sophisticated algorithmic traders and/or traders in the wholesale energy markets. *Arconic Inc. V. Novelis Inc.*, Civ. A. No. 17-1434, 2020 WL 7247112 (W.D. Pa. Dec. 8, 2020).

B. Whether Dr. Chen's use of his experience and subjective knowledge of electricity, programming, network design, algorithmic trading and the wholesale electricity markets to create Entergrid's trading strategies means that Elmagin cannot claim such strategies as a misappropriation of Elmagin's trade secrets. *SI Handling Sys. v. Heisley*, 743 F.2d 1244 (3d Cir. 1985).

C. Whether there could be a trade secret in Elmagin's trading strategies if Dr. Chen were able to rely on his memories from more than a year earlier to recreate them. *SI Handling Sys. v. Heisley*, 743 F.2d 1244, 1262 (3d Cir. 1985).

D. Whether Elmagin has shown that its trading strategies are trade secrets because they are a unique combination of generally known or readily ascertainable elements that provides Elmagin with a competitive advantage. *Arconic Inc. V. Novelis Inc.*, Civ. A. No. 17-1434, 2020 WL 7247112 (W.D. Pa. Dec. 8, 2020).

E. Whether the scope of each of Elmagin's alleged trade secrets is narrow because of the extent of the general knowledge among reasonably sophisticated algorithmic traders and/or traders in the wholesale electricity market, as well as Dr. Chen's own general skills, knowledge and experience. *American Can Co. v. Mansukhani*, 742 F.2d 314, 331 (7th Cir. 1984) ("the district court applied a standard of functional or practical similarity to determine whether defendants should be enjoined from selling their new inks. Similarity may be probative of derivation, but it is much less probative where the scope of the trade secrets is as narrow as it is in this case. The 'similarity' standard lost sight of the original limitations on the plaintiff's trade secrets. Plaintiff was entitled to protection only if defendants' new inks were substantially derived from plaintiff's trade secrets and not from public information and [the defendants'] general skill, experience and knowledge. More than a finding of similarity was required where the public information and defendant's own knowledge confined so narrowly the scope of the valid trade secrets.")

F. Whether Elmagin has disproven Dr. Chen's independent creation of Entergrid's trading strategies. *Moore v. Kulicke & Soffa Indus., Inc.*, 318 F.3d 561, 572 (3d Cir. 2003).

G. Whether Elmagin has failed to establish that its purported trade secrets have value because they are kept secret. *sit-up Ltd. V. IAC/InterActive Corp.* No. 05 Civ. 9292, 2008 WL 463884 (S.D.N.Y. Feb 20, 2008).

H. Whether Elmagin has proven substantial similarity between its alleged trade secrets and some or all of Entergrid's trading strategies. *Scanvec Amiable Ltd. v. Chang*, 80 Fed. Appx. 171 (3d Cir. 2003).

I. Whether Elmagin has failed to prove that the purported similarities, if any between its trade secrets and some or all of Entergrid's trading strategies are anything more than elements that are generally known and/or readily ascertainable to relatively sophisticated

algorithmic traders and/or traders in the wholesale electricity markets. *SI Handling Sys. v. Heisley*, 743 F.2d 1244 (3d Cir. 1985).

J. Whether Elmagin has failed to show that the similarities between its trading strategies and Entergrid's trading strategies are due to that which makes them allegedly trade secrets, as opposed to the general knowledge among reasonably sophisticated algorithmic traders and/or traders in the wholesale electricity market, as well as Dr. Chen's own general skills, knowledge and experience. *American Can Co. v. Mansukhani*, 742 F.2d 314, 331 (7th Cir. 1984).

K. Whether Elmagin has proven it is entitled to recover as damages some or all of Entergrid's trading profits as a result of the alleged misappropriation, including appropriate apportionment and time period for recovery. *Texas Advanced Optoelectronic Solutions, Inc. v. Renesas Electronics America, Inc.*, 895 F.3d 1304 (Fed. Cir. 2018)

L. Whether Entergrid has identified any alleged "Confidential Information" beyond its alleged trade secrets that Defendants Chen and/or Petty were alleged to have disclosed in violation of their NDAs. *Hill v. Best Med. Int'l, Inc.*, No. CA 07-1709, 2011 WL 5082208, at \*36 (W.D. Pa. Oct. 25, 2011). [Standish, J.] (granting summary judgment of no breach of confidentiality provision because plaintiff "fails to establish damages from Defendants simply retaining these Alleged Confidential Materials. Allowing a claim for breach of the confidentiality provisions of a contract to proceed solely on the fact that the author designated a particular document as confidential would theoretically allow a claim to arise if the defendant copied, for example, the Christmas shopping list of a co-employer, that is, a document that had no economic value to BMI. Without evidence to support this bare allegation of confidentiality, and without a hint to the Court of what these Alleged Confidential Materials might be, to the extent the breach of contract claim rests on these documents or files, that claim must fail.").

M. Whether the perpetual nondisclosure obligations in the NDNC and the Petty Consulting Agreement are reasonably limited in duration as required under Pennsylvania contract law. *Hess v. Gebhard Co.*, 570 Pa. 148, 808 A.2d 912, 917 (2002).

N. Whether Elmagin is entitled to an equitable accounting under the Defend Trade Secrets Act, 18 U.S.C. § 1836, the Pennsylvania Uniform Trade Secrets Act, 12 Pa. C.S.A. § 5301 et seq., or Pennsylvania contract law given that Elmagin has an adequate remedy at law under each of these claims. *Precision Industrial Equipment v. IPC Eagle*, Civ. A. No. 14-322, 2016 WL 192601, at \*9 (E.D. Pa. Jan. 14, 2016) ("Equitable jurisdiction for an accounting does not exist merely because the plaintiff desires information that he could obtain through discovery.") (cleaned up).

O. As the undisputed evidence in this case conclusively shows that Dr. Chen honored both the non-compete and non-solicitation clauses in his Non-Disclosure Non-Competition Agreement with Elmagin, whether to enter into the record as an uncontested fact to be read to the jury at the beginning of trial the fact of Dr. Chen's compliance with these clauses.



## **VI. Objections to Admissibility of Evidence, with grounds and authority**

### **A. Objections to Documents**

Please see Appendix B, which has been updated in light of the Court's rulings on motions *in limine*.

### **B. Objections to Authenticity of Documents**

Plaintiff's Proposed Trial Exhibit 114 is without any indication as to the circumstances of its origin, author, or nature.

Plaintiff's Proposed Trial Exhibit 189 appears to contain highlighting that was not included on the original document.

### **C. Lay Opinion Testimony (Fed. R. Evid. 701).**

The Court has addressed this subject in ruling on the motions *in limine*.

Dated: April 6, 2022

Respectfully Submitted,

/s/ Nicole D. Galli

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**APPENDIX A: DEPOSITION DESIGNATIONS**

These updated designations reflect the withdrawal of designations of attorney colloquy or objections. The withdrawn matter is indicated in italicized text on rows beginning with “Removing”. By way of explanation, the line “Removing Chiang 10:21-10-21” beneath the line “Chiang 10:17-11:19” reflects the withdrawal of the indicated one line objection from the designation.

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Chiang	7	5	7	12
Chiang	10	17	11	19
<i>Removing Chiang</i>	10	21	10	21
Chiang	11	20	12	4
<i>Removing Chiang</i>	11	8	11	8
Chiang	14	9	14	19
Chiang	15	20	16	15
Chiang	28	12	28	20
Chiang	29	9	31	12
<i>Removing Chiang</i>	30	16	30	16
<i>Removing Chiang</i>	31	3	31	3
Chiang	32	5	32	13
Chiang	32	17	33	5
Chiang	34	4	35	6
<i>Removing Chiang</i>	34	6	34	6
<i>Removing Chiang</i>	34	4	35	4
Chiang	38	5	38	17
<i>Removing Chiang</i>	38	12	38	12
Chiang	39	24	43	14
<i>Removing Chiang</i>	43	4	43	4
Chiang	58	13	58	24
Chiang	64	8	64	13
Chiang	68	13	70	8
Chiang	71	11	73	4
<i>Removing Chiang</i>	73	2	73	2
Chiang	81	6	82	19
<i>Removing Chiang</i>	81	10	81	10
Chiang	94	20	94	23

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Chiang	95	13	96	3
Chiang	100	2	101	23
<i>Removing Chiang</i>	101	5	101	5
Chiang	106	8	106	20
Chiang	114	6	114	19
Chiang	115	10	121	9
<i>Removing Chiang</i>	115	16	115	16
<i>Removing Chiang</i>	116	10	116	10
<i>Removing Chiang</i>	117	14	117	14
<i>Removing Chiang</i>	118	16	118	16
<i>Removing Chiang</i>	120	3	120	3
<i>Removing Chiang</i>	120	23	120	23
Chiang	122	4	124	6
Chiang	126	1	128	12
<i>Removing Chiang</i>	126	8	126	8
<i>Removing Chiang</i>	128	8	128	8
Chiang	136	17	137	11
<i>Removing Chiang</i>	136	20	136	20
Chiang	139	14	139	24
<i>Removing Chiang</i>	139	17	139	17
Chiang	147	24	148	16
Elmagin 30(b)(6)	141	15	141	18
Elmagin 30(b)(6)	143	5	143	18
Elmagin 30(b)(6)	176	20	176	21
Elmagin 30(b)(6)	176	23	176	24
Elmagin 30(b)(6)	177	2	177	8
Elmagin 30(b)(6)	177	19	178	3
Elmagin 30(b)(6)	178	9	178	12
Elmagin 30(b)(6)	200	13	200	22
<i>Removing Elmagin 30(b)(6)</i>	201	1	201	9
Elmagin 30(b)(6)	201	6	201	9
Elmagin 30(b)(6)	201	20	202	4
Elmagin 30(b)(6)	204	16	205	12
Elmagin 30(b)(6)	207	11	207	15

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Elmagin 30(b)(6)	207	17	207	19
Elmagin 30(b)(6)	207	21	208	1
Elmagin 30(b)(6)	208	3	208	11
Elmagin 30(b)(6)	209	11	209	12
Elmagin 30(b)(6)	209	14	210	3
Elmagin 30(b)(6)	217	3	219	3
Elmagin 30(b)(6)	219	4	220	21
Elmagin 30(b)(6)	223	6	223	7
Elmagin 30(b)(6)	223	9	223	10
Elmagin 30(b)(6)	223	12	223	13
Elmagin 30(b)(6)	223	15	223	20
Elmagin 30(b)(6)	223	22	224	6
Elmagin 30(b)(6)	224	8	224	12
Elmagin 30(b)(6)	225	4	225	8
Elmagin 30(b)(6)	225	20	226	8
Elmagin 30(b)(6)	226	10	226	12
Elmagin 30(b)(6)	226	14	227	9
Elmagin 30(b)(6)	227	19	227	21
Elmagin 30(b)(6)	227	24	229	3
Elmagin 30(b)(6)	229	14	229	17
Elmagin 30(b)(6)	229	19	230	1
Elmagin 30(b)(6)	232	9	232	11
Elmagin 30(b)(6)	232	13	233	9
Elmagin 30(b)(6)	233	11	233	17
Elmagin 30(b)(6)	234	3	234	17
Elmagin 30(b)(6)	235	19	237	5
Elmagin 30(b)(6)	238	3	239	4
Elmagin 30(b)(6)	239	9	239	11
Elmagin 30(b)(6)	240	1	240	2
Elmagin 30(b)(6)	240	9	241	19
Elmagin 30(b)(6)	241	21	241	23
Elmagin 30(b)(6)	242	1	242	20
Elmagin 30(b)(6)	242	22	242	24
Elmagin 30(b)(6)	243	5	243	6

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Elmagin 30(b)(6)	243	8	243	10
Elmagin 30(b)(6)	243	12	244	17
Elmagin 30(b)(6)	245	23	246	15
Elmagin 30(b)(6)	246	20	247	1
Elmagin 30(b)(6)	247	4	248	10
Elmagin 30(b)(6)	249	9	249	14
Elmagin 30(b)(6)	249	19	250	8
Elmagin 30(b)(6)	250	10	250	14
Elmagin 30(b)(6)	250	17	252	15
<i>Removing Elmagin 30(b)(6)</i>	251	13	251	16
Elmagin 30(b)(6)	252	19	253	5
Elmagin 30(b)(6)	253	7	253	13
Elmagin 30(b)(6)	253	15	253	17
Elmagin 30(b)(6)	253	19	254	8
Elmagin 30(b)(6)	254	10	254	12
Elmagin 30(b)(6)	254	14	254	21
Elmagin 30(b)(6)	254	23	254	24
Elmagin 30(b)(6)	255	5	255	11
Elmagin 30(b)(6)	255	13	255	21
Elmagin 30(b)(6)	255	23	256	13
Elmagin 30(b)(6)	256	15	258	10
Elmagin 30(b)(6)	258	11	258	17
Elmagin 30(b)(6)	258	17	259	6
Elmagin 30(b)(6)	259	8	261	3
Elmagin 30(b)(6)	261	23	262	2
Elmagin 30(b)(6)	262	19	265	1
Elmagin 30(b)(6)	267	1	267	20
Elmagin 30(b)(6)	267	23	267	24
Elmagin 30(b)(6)	268	2	268	13
Elmagin 30(b)(6)	268	22	269	5
Elmagin 30(b)(6)	269	6	269	16
Elmagin 30(b)(6)	269	18	270	7
Elmagin 30(b)(6)	270	12	270	18
Elmagin 30(b)(6)	270	21	271	13

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Elmagin 30(b)(6)	271	16	272	1
Elmagin 30(b)(6)	272	3	272	12
Elmagin 30(b)(6)	272	19	273	6
Elmagin 30(b)(6)	273	7	273	24
<i>Removing Elmagin 30(b)(6)</i>	273	9	273	9
Elmagin 30(b)(6)	274	2	274	4
Elmagin 30(b)(6)	274	6	274	18
Elmagin 30(b)(6)	274	20	274	23
Elmagin 30(b)(6)	275	2	276	18
Elmagin 30(b)(6)	276	20	276	21
Elmagin 30(b)(6)	276	20	276	21
Elmagin 30(b)(6)	276	23	278	20
<i>Removing Elmagin 30(b)(6)</i>	276	19	276	19
<i>Removing Elmagin 30(b)(6)</i>	276	22	276	22
<i>Removing Elmagin 30(b)(6)</i>	277	2	277	2
Elmagin 30(b)(6)	281	23	282	13
Elmagin 30(b)(6)	282	14	283	2
Elmagin 30(b)(6)	283	5	283	15
Elmagin 30(b)(6)	283	17	286	1
<i>Removing Elmagin 30(b)(6)</i>	285	6	285	6
Elmagin 30(b)(6)	286	1	286	1
Elmagin 30(b)(6)	286	3	286	20
Elmagin 30(b)(6)	287	10	287	10
Elmagin 30(b)(6)	287	13	288	19
<i>Removing Elmagin 30(b)(6)</i>	288	9	288	9
Elmagin 30(b)(6)	289	14	289	21
Elmagin 30(b)(6)	289	23	290	2
Elmagin 30(b)(6)	290	4	292	4
Elmagin30(b)(6)	297	9	305	23
<i>Removing Elmagin 30(b)(6)</i>	297	13	297	13
<i>Removing Elmagin 30(b)(6)</i>	298	13	298	13
<i>Removing Elmagin 30(b)(6)</i>	300	8	300	8
<i>Removing Elmagin 30(b)(6)</i>	301	16	301	16
<i>Removing Elmagin 30(b)(6)</i>	302	8	302	8

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Elmagin 30(b)(6)</i>	303	14	304	6
<i>Removing Elmagin 30(b)(6)</i>	304	14	304	15
<i>Removing Elmagin 30(b)(6)</i>	200	23	201	5
Gates, Kevin	5	22	5	25
Gates, Kevin	6	1	6	4
Gates, Kevin	19	19	22	11
<i>Removing Gates, Kevin</i>	21	7	21	7
Gates, Kevin	42	3	44	9
<i>Removing Gates, Kevin</i>	43	22	43	22
Gates, Kevin	44	11	45	22
<i>Removing Gates, Kevin</i>	45	10	45	10
Gates, Kevin	45	9	47	1
Gates, Kevin	46	19	48	21
Gates, Kevin	49	16	49	18
Gates, Kevin	49	20	50	2
Gates, Kevin	50	4	50	18
Gates, Kevin	55	14	56	8
<i>Removing Gates, Kevin</i>	55	16	55	16
Gates, Kevin – Chuck Please see and delete or make yellow – noise in room	55	20	55	23
Gates, Kevin	59	13	60	11
<i>Removing Gates, Kevin</i>	59	16	59	16
<i>Removing Gates, Kevin</i>	59	25	59	25
Gates, Kevin	65	22	66	14
Gates, Kevin	68	22	69	3
<i>Removing Gates, Kevin</i>	68	24	68	24
Gates, Kevin	69	5	70	10
<i>Removing Gates, Kevin</i>	69	7	69	7
<i>Removing Gates, Kevin</i>	69	13	69	13
<i>Removing Gates, Kevin</i>	69	206	69	20
Gates, Kevin	70	11	70	24
Gates, Kevin	74	18	76	14
<i>Removing Gates, Kevin</i>	74	19	74	19
<i>Removing Gates, Kevin</i>	75	13	75	13

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Gates, Kevin</i>	75	19	75	19
<i>Removing Gates, Kevin</i>	76	7	76	7
Gates, Kevin	77	22	77	25
Gates, Kevin	80	12	81	14
<i>Removing Gates, Kevin</i>	80	14	80	14
<i>Removing Gates, Kevin</i>	81	8	81	8
<i>Removing Gates, Kevin</i>	81	13	81	13
Gates, Kevin	90	7	91	20
<i>Removing Gates, Kevin</i>	90	11	90	11
<i>Removing Gates, Kevin</i>	90	24	90	24
Gates, Kevin	99	24	100	8
<i>Removing Gates, Kevin</i>	100	2	100	2
Gates, Kevin	101	14	103	21
<i>Removing Gates, Kevin</i>	101	16	101	17
<i>Removing Gates, Kevin</i>	102	22	102	22
<i>Removing Gates, Kevin</i>	103	9	103	9
Gates, Kevin	106	9	107	22
<i>Removing Gates, Kevin</i>	106	11	106	11
<i>Removing Gates, Kevin</i>	107	2	107	2
<i>Removing Gates, Kevin</i>	107	8	107	8
<i>Removing Gates, Kevin</i>	107	14	107	14
<i>Removing Gates, Kevin</i>	107	21	107	21
Gates, Kevin	108	16	108	24
<i>Removing Gates, Kevin</i>	108	18	108	18
<i>Removing Gates, Kevin</i>	108	23	108	23
Gates, Kevin	110	25	111	22
Gates, Kevin	111	12	111	14
<b>Gates, Kevin (inadvertently omitted)</b>	<b>121</b>	<b>23</b>	<b>122</b>	<b>1</b>
<b>Gates, Kevin (inadvertently omitted)</b>	<b>122</b>	<b>3</b>	<b>122</b>	<b>5</b>
Gates, Kevin	136	6	137	25
<i>Removing Gates, Kevin</i>	136	8	136	8
<i>Removing Gates, Kevin</i>	136	19	136	19
<i>Removing Gates, Kevin</i>	137	1	137	7



<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Gates, Kevin</i>	137	12	137	12
<i>Removing Gates, Kevin</i>	137	24	137	24
Gates, Kevin	146	21	147	2
Gates, Kevin	147	5	147	12
Gates, Kevin	152	16	152	20
Gates, Kevin	152	24	153	4
Gates, Kevin	164	14	164	16
<i>Removing Gates, Kevin</i>	180	5	185	11
Gates, Kevin	180	13	180	21
Gates, Kevin	180	23	181	5
Gates, Kevin	181	7	181	14
Gates, Kevin	183	18	184	4
Gates, Kevin	184	25	185	24
Gates, Kevin	185	12	186	21
Gates, Kevin	185	22	186	3
<i>Removing Gates, Kevin</i>	185	25	182	25
Gates, Kevin	186	1	186	6
Gates, Kevin	186	8	186	16
Gates, Kevin	186	18	187	1
Gates, Kevin	200	9	200	13
Gates, Kevin	207	16	214	16
<i>Removing Gates, Kevin</i>	207	19	207	19
<i>Removing Gates, Kevin</i>	208	12	208	12
<i>Removing Gates, Kevin</i>	208	20	208	20
<i>Removing Gates, Kevin</i>	209	5	209	5
Gates, Kevin	215	13	215	15
Gates, Kevin	216	19	216	23
Gates, Kevin	217	3	217	10
<i>Removing Gates, Kevin</i>	217	6	217	6
Gates, Kevin	217	19	217	23
Gates, Kevin	217	25	218	4
Gates, Kevin	219	16	224	9
<i>Removing Gates, Kevin</i>	219	21	219	21
<i>Removing Gates, Kevin</i>	220	16	220	16

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Gates, Kevin</i>	221	1	221	1
<i>Removing Gates, Kevin</i>	221	18	221	18
<i>Removing Gates, Kevin</i>	222	21	222	21
<i>Removing Gates, Kevin</i>	222	24	222	24
<i>Removing Gates, Kevin</i>	223	11	223	21
Gates, Kevin	227	5	232	4
<i>Removing Gates, Kevin</i>	228	15	228	15
<i>Removing Gates, Kevin</i>	229	7	229	7
<i>Removing Gates, Kevin</i>	229	24	229	24
<i>Removing Gates, Kevin</i>	230	15	230	15
<i>Removing Gates, Kevin</i>	231	18	231	18
Gates, Kevin	233	17	234	14
<i>Removing Gates, Kevin</i>	233	22	233	22
Gates, Kevin	235	17	240	21
<i>Removing Gates, Kevin</i>	236	8	236	8
<i>Removing Gates, Kevin</i>	236	24	236	24
<i>Removing Gates, Kevin</i>	237	12	237	12
<i>Removing Gates, Kevin</i>	238	5	238	5
<i>Removing Gates, Kevin</i>	238	15	238	15
<i>Removing Gates, Kevin</i>	239	1	239	1
<i>Removing Gates, Kevin</i>	239	18	239	18
<i>Removing Gates, Kevin</i>	240	10	240	10
Gates, Kevin	245	13	254	15
Gates, Kevin <b>(included in above)</b>	247	22	247	24
<i>Removing Gates, Kevin</i>	245	23	245	23
<i>Removing Gates, Kevin</i>	246	23	246	23
<i>Removing Gates, Kevin</i>	247	10	247	11
<i>Removing Gates, Kevin</i>	248	8	248	8
<i>Removing Gates, Kevin</i>	249	12	249	12
<i>Removing Gates, Kevin</i>	249	25	249	25
<i>Removing Gates, Kevin</i>	250	16	250	16
<i>Removing Gates, Kevin</i>	251	7	251	7
<i>Removing Gates, Kevin</i>	252	6	252	6
<i>Removing Gates, Kevin</i>	252	24	252	24

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Gates, Kevin</i>	253	25	253	25
<i>Removing Gates, Kevin</i>	254	7	254	7
Gates, Richard	5	4	5	17
Gates, Richard	13	12	14	1
Gates, Richard	14	7	14	16
Gates, Richard	15	4	15	8
Gates, Richard	30	22	30	24
Gates, Richard	31	1	31	1
Gates, Richard	31	3	31	3
Gates, Richard	31	4	31	20
Gates, Richard	51	4	51	6
Gates, Richard	51	20	52	3
Gates, Richard	52	15	52	21
Gates, Richard	53	14	53	16
Gates, Richard	53	18	53	22
Gates, Richard	53	24	54	2
Gates, Richard	54	3	54	11
<i>Removing Gates, Richard</i>	54	5	54	5
<i>Removing Gates, Richard</i>	54	8	54	8
Gates, Richard	54	22	54	23
Gates, Richard	54	25	55	2
Gates, Richard	55	4	55	4
Gates, Richard	55	17	55	19
<i>Removing Gates, Richard</i>	55	18	55	18
Gates, Richard	60	16	61	4
<i>Removing Gates, Richard</i>	60	18	60	18
Gates, Richard	61	5	61	21
<i>Removing Gates, Richard</i>	61	7	60	7
<i>Removing Gates, Richard</i>	61	13	60	13
Gates, Richard	61	23	62	20
Gates, Richard	69	8	69	13
<i>Removing Gates, Richard</i>	69	11	69	11
Gates, Richard	71	2	71	8
Gates, Richard	71	10	71	22

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Gates, Richard	71	18	71	22
Gates, Richard	92	16	93	1
<i>Removing Gates, Richard</i>	92	19	92	19
Gates, Richard	99	17	100	9
<i>Removing Gates, Richard</i>	99	19	99	19
Gates, Richard	105	7	105	21
Gates, Richard	105	22	107	13
<i>Removing Gates, Richard</i>	105	9	105	9
Gates, Richard	117	20	118	14
<i>Removing Gates, Richard</i>	118	2	118	2
Gates, Richard	118	1	118	14
<i>Removing Gates, Richard</i>	118	2	118	2
Gates, Richard	121	3	121	18
<i>Removing Gates, Richard</i>	121	6	121	6
Gates, Richard	152	22	153	16
<i>Removing Gates, Richard</i>	153	3	153	3
Gates, Richard	154	7	154	18
<i>Removing Gates, Richard</i>	154	10	154	10
Gates, Richard	155	11	156	10
Gates, Richard	156	11	159	7
<i>Removing Gates, Richard</i>	156	12	156	12
<i>Removing Gates, Richard</i>	156	20	156	20
Gates, Richard	157	5	159	7
<i>Removing Gates, Richard</i>	157	7	157	7
<i>Removing Gates, Richard</i>	158	2	158	2
<i>Removing Gates, Richard</i>	158	22	158	22
Gates, Richard	158	11	158	12
Gates, Richard	172	20	173	7
Gates, Richard	218	16	219	13
<i>Removing Gates, Richard</i>	218	24	218	24
Gates, Richard	219	14	220	4
<i>Removing Gates, Richard</i>	219	1	219	1
<i>Removing Gates, Richard</i>	219	22	219	22
Gates, Richard	220	16	221	13

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Gates, Richard</i>	220	18	220	18
<i>Removing Gates, Richard</i>	220	24	220	24
Gates, Richard	225	8	225	19
<i>Removing Gates, Richard</i>	225	10	225	10
Pirrong	9	23	13	8
<i>Removing Pirrong</i>	11	7	11	7
<i>Removing Pirrong</i>	11	14	11	14
<i>Removing Pirrong</i>	11	22	13	1
Pirrong	16	20	17	8
<i>Removing Pirrong</i>	16	22	16	22
<i>Removing Pirrong</i>	17	4	17	4
Pirrong	19	5	19	20
Pirrong	21	8	21	21
<i>Removing Pirrong</i>	21	14	21	14
Pirrong	22	17	23	18
<i>Removing Pirrong</i>	22	20	22	20
<i>Removing Pirrong</i>	23	8	23	8
Pirrong	56	11	60	11
Pirrong	57	18	60	15
Pirrong	61	22	64	10
Pirrong	77	20	82	4
<i>Removing Pirrong</i>	79	22	79	22
<i>Removing Pirrong</i>	80	5	80	5
<i>Removing Pirrong</i>	81	2	81	2
<i>Removing Pirrong</i>	81	15	81	15
Pirrong	81	9	82	4
Pirrong	83	16	84	12
<i>Removing Pirrong</i>	84	3	84	3
Pirrong	85	7	85	12
<i>Removing Pirrong</i>	85	9	85	9
Pirrong	87	8	87	8
Pirrong	88	21	89	17
<i>Removing Pirrong</i>	89	2	89	2
<i>Removing Pirrong</i>	89	9	89	9

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Pirrong</i>	89	14	89	14
Pirrong	123	9	124	5
<i>Removing Pirrong</i>	123	19	123	19
<i>Removing Pirrong</i>	123	19	123	23
Pirrong	125	20	125	24
Pirrong	126	14	127	20
<i>Removing Pirrong</i>	127	10	127	10
Pirrong	127	21	128	3
Pirrong	137	23	140	4
<i>Removing Pirrong</i>	138	19	138	19
<i>Removing Pirrong</i>	139	9	139	9
<i>Removing Pirrong</i>	139	14	139	14
Pirrong	138	12	140	4
Pirrong	139	22	140	4
Pirrong	140	5	140	7
Pirrong	140	9	140	21
Pirrong	157	15	157	19
Pirrong	157	23	158	10
Pirrong	158	13	158	14
Pirrong	158	16	158	21
Pirrong	175	24	176	9
<i>Removing Pirrong</i>	176	4	176	4
Pirrong	177	3	177	4
Pirrong	177	6	177	12
Pirrong	184	18	184	19
Pirrong	184	21	184	24
Pirrong	185	2	185	4
Pirrong	185	6	185	23
Pirrong	186	1	195	8
<i>Removing Pirrong</i>	186	4	186	4
<i>Removing Pirrong</i>	187	13	187	13
<i>Removing Pirrong</i>	188	24	188	24
<i>Removing Pirrong</i>	189	16	189	16
<i>Removing Pirrong</i>	190	6	190	6

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Pirrong</i>	191	4	191	4
<i>Removing Pirrong</i>	192	5	192	5
<i>Removing Pirrong</i>	192	13	192	13
<i>Removing Pirrong</i>	193	1	193	1
<i>Removing Pirrong</i>	193	17	193	17
Pirrong	188	11	188	20
<i>Removing Pirrong</i>	188	16	188	16
Pirrong	209	6	209	12
Pirrong	209	12	210	16
Pirrong	213	7	213	23
<i>Removing Pirrong</i>	213	20	213	20
Pirrong	214	1	215	1
Pirrong	218	19	219	20
<i>Removing Pirrong</i>	218	24	218	24
Pirrong	219	21	220	6
Pirrong	220	8	220	10
Pirrong	235	20	236	24
<i>Removing Pirrong</i>	236	2	236	2
<i>Removing Pirrong</i>	236	9	236	9
Pirrong	240	3	240	9
<i>Removing Pirrong</i>	240	5	240	5
Pirrong	240	18	241	5
<i>Removing Pirrong</i>	240	20	240	20
Pirrong	263	7	278	12
<i>Removing Pirrong</i>	263	9	263	9
<i>Removing Pirrong</i>	264	17	264	17
<i>Removing Pirrong</i>	265	5	265	5
<i>Removing Pirrong</i>	265	24	265	24
<i>Removing Pirrong</i>	266	5	266	5
<i>Removing Pirrong</i>	266	15	266	15
<i>Removing Pirrong</i>	267	22	267	22
<i>Removing Pirrong</i>	269	15	269	15
<i>Removing Pirrong</i>	270	24	270	24
<i>Removing Pirrong</i>	272	6	272	6

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Pirrong</i>	273	5	273	5
<i>Removing Pirrong</i>	275	7	275	7
<i>Removing Pirrong</i>	276	8	276	8
Pirrong	309	6	309	12
<i>Removing Pirrong</i>	309	9	309	9
Pirrong	320	23	321	9
Pirrong	322	2	323	7
<i>Removing Pirrong</i>	322	5	322	5
Pirrong	323	8	324	12
Pirrong	324	22	325	8
<i>Removing Pirrong</i>	325	2	325	2
Pirrong	326	3	326	16
Pirrong	326	17	327	10
Pirrong	331	13	331	24
<i>Removing Pirrong</i>	331	17	331	17
<i>Removing Pirrong</i>	331	22	331	22
Pirrong	337	11	339	16
<i>Removing Pirrong</i>	338	7	338	7
<i>Removing Pirrong</i>	339	2	339	2
Tian	7	21	8	8
Tian	12	2	13	9
Tian	14	2	17	24
<i>Removing Tian</i>	15	9	15	9
<i>Removing Tian</i>	17	7	17	7
Tian	20	21	21	21
Tian	21	22	23	20
Tian	24	12	24	21
Tian	30	17	32	22
Tian	45	8	45	8
Tian	45	10	45	17
Tian	50	16	53	3
Tian	53	20	55	20
Tian	56	11	57	4
<i>Removing Tian</i>	56	15	56	15



<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Tian	57	9	59	3
Tian	59	6	59	16
Tian	82	6	82	7
Tian	82	9	84	12
Tian	84	14	85	9
Tian	89	17	90	2
Tian	90	5	91	1
Tian	91	3	91	6
Tian	91	8	91	23
Yuros	11	8	11	9
Yuros	11	10	11	15
Yuros	12	21	13	1
Yuros	15	24	16	3
Yuros	16	4	16	8
Yuros	16	9	16	13
Yuros	18	1	18	10
Yuros	18	7	18	10
Yuros	20	20	21	3
Yuros	21	4	22	2
Yuros	25	12	25	18
Yuros	29	25	30	1
Yuros	30	7	30	17
Yuros	31	1	31	11
Yuros	33	11	33	16
Yuros	34	12	34	14
Yuros	34	19	34	20
Yuros	34	24	35	1
Yuros	35	3	35	8
Yuros	35	10	35	14
Yuros	35	19	35	20
Yuros	36	15	37	1
Yuros	37	8	37	14
Yuros	37	17	37	19
Yuros	37	22	39	1

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Yuros	51	23	52	1
<i>Removing Yuros</i>	51	25	51	25
Yuros	53	21	54	1
Yuros	54	2	54	6
Yuros	58	3	58	8
Yuros	59	23	61	6
Yuros	61	20	64	12
Yuros	64	15	64	16
Yuros	64	18	64	22
Yuros	64	24	65	7
Yuros	66	20	66	24
Yuros	67	1	67	8
<i>Removing Yuros</i>	67	20	67	20
Yuros	67	10	68	11
<i>Removing Yuros</i>	68	4	68	4
Yuros	69	13	70	6
Yuros	70	23	70	25
Yuros	71	4	72	2
Yuros	78	1	78	11
Yuros	79	4	79	6
Yuros	79	8	79	17
Yuros	79	19	79	19
Yuros	79	21	79	22
Yuros	80	4	80	4
Yuros	80	6	80	11
Yuros	80	13	80	16
Yuros	80	18	82	19
Yuros	82	21	82	22
Yuros	82	24	82	24
Yuros	83	1	83	1
Yuros	83	3	83	11
Yuros	83	13	83	13
Yuros	83	15	84	18
Yuros	84	20	84	20

Deponent	Start Page	Start Line	End Page	End Line
Yuros	84	22	85	1
Yuros	85	10	86	6
Yuros	86	8	86	12
Yuros	86	17	86	19
Yuros	86	21	86	23
Yuros	86	25	87	1
Yuros	87	3	87	6
Yuros	87	8	87	8
Yuros	87	10	87	11
Yuros	87	24	88	4
Yuros	93	19	93	22
Yuros	93	24	94	16
Yuros	94	18	94	23
Yuros	94	25	95	1
Yuros	95	3	95	6
Yuros	95	8	95	10
Yuros	95	12	95	14
Yuros	95	16	95	18
Yuros	97	3	97	4
Yuros	97	6	97	8
Yuros	97	10	97	19
Yuros	102	12	103	1
<i>Removing Yuros</i>	102	22	102	22
Yuros	103	5	104	13
<i>Removing Yuros</i>	103	7	103	7
<i>Removing Yuros</i>	103	13	103	13
<i>Removing Yuros</i>	104	10	104	10
Yuros	103	21	103	23
Yuros	104	25	105	4
Yuros	105	13	105	14
Yuros	105	16	105	17
Yuros	105	19	105	20
Yuros	105	24	106	1
Yuros	106	15	106	20

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Yuros	107	6	107	14
<i>Removing Yuros</i>	107	8	107	8
Yuros	109	25	111	8
<i>Removing Yuros</i>	110	7	110	7
<i>Removing Yuros</i>	111	6	111	6
Yuros	111	25	112	19
Yuros	113	19	115	10
<i>Removing Yuros</i>	114	1	114	1
<i>Removing Yuros</i>	115	1	115	1
Yuros	114	5	114	10
<i>Removing Yuros</i>	114	6	114	6
<i>Removing Yuros</i>	114	13	114	13
Yuros	114	20	115	4
Yuros	114	24	115	4
Yuros	115	6	115	23
<i>Removing Yuros</i>	115	19	115	19
Yuros	115	25	116	4
<i>Removing Yuros</i>	116	2	116	2
Yuros	116	6	116	6
Yuros	116	8	116	13
Yuros	116	15	116	16
Yuros	116	19	116	24
Yuros	117	1	117	3
Yuros	117	5	117	13
<i>Removing Yuros</i>	117	7	117	7
Yuros	120	17	120	18
Yuros	120	20	120	20
Yuros	120	22	121	21
Yuros	121	23	121	25
Yuros	122	2	122	7
Yuros	124	9	124	11
Yuros	124	13	124	14
Yuros	124	16	124	19
Yuros	126	11	128	25

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Yuros</i>	126	13	126	13
<i>Removing Yuros</i>	126	21	126	21
Yuros	127	5	128	25
<i>Removing Yuros</i>	128	2	28	2
Yuros	127	21	128	18
Yuros	128	6	128	8
Yuros	128	9	128	13
Yuros	128	14	128	18
Yuros	129	16	129	22
<i>Removing Yuros</i>	129	18	129	18
Yuros	134	17	134	20
Yuros	134	22	135	1
Yuros	135	4	135	7
Yuros	135	9	135	23
Yuros	135	25	136	2
Yuros	143	10	143	14
Yuros	144	4	144	18
Yuros	144	20	144	22
Yuros	145	4	145	5
Yuros	145	7	145	9
Yuros	145	24	145	25
Yuros	146	2	146	5
Yuros	148	4	148	8
Yuros	148	10	148	11
Yuros	148	13	148	13
Yuros	148	15	148	16
Yuros	148	18	148	23
Yuros	148	11	149	13
<i>Removing Yuros</i>	148	14	148	14
<i>Removing Yuros</i>	149	1	149	1
Yuros	149	15	149	17
Yuros	149	25	150	7
Yuros	157	9	163	15
<i>Removing Yuros</i>	157	17	157	17

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Yuros</i>	158	10	158	10
<i>Removing Yuros</i>	158	20	158	23
<i>Removing Yuros</i>	159	7	159	7
<i>Removing Yuros</i>	159	19	159	19
<i>Removing Yuros</i>	159	24	159	24
<i>Removing Yuros</i>	160	16	160	16
Yuros	157	9	157	18
<i>Removing Yuros</i>	157	17	157	17
Yuros	161	7	162	12
Yuros	161	11	163	9
<i>Removing Yuros</i>	161	13	161	13
<i>Removing Yuros</i>	161	19	161	19
<i>Removing Yuros</i>	161	24	161	24
Yuros	163	17	163	21
<i>Removing Yuros</i>	163	12	163	12
Yuros	163	23	163	24
Yuros	164	2	164	3
Yuros	164	5	164	16
Yuros	164	18	164	24
Yuros	165	1	165	5
Yuros	165	7	165	18
Yuros	165	20	165	21
Yuros	166	13	166	13
Yuros	166	15	166	16
Yuros	166	18	166	24
Yuros	167	1	167	6
Yuros	167	12	167	15
Yuros	167	17	167	19
Yuros	167	21	167	21
Yuros	167	23	167	25
Yuros	168	2	168	2
Yuros	168	4	168	7
Yuros	177	22	177	23
Yuros	177	25	178	4

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Yuros	178	6	178	7
Yuros	178	9	178	11
Yuros	178	13	178	13
Yuros	178	15	178	20
Yuros	178	22	178	23
Yuros	179	7	179	7
Yuros	179	9	179	12
Yuros	179	14	179	14
Yuros	179	16	179	17
Yuros	179	19	179	20
Yuros	179	23	180	10
<i>Removing Yuros</i>	180	8	180	8
Yuros	180	12	180	12
Yuros	180	14	180	17
Yuros	180	21	180	21
Yuros	180	23	180	24
Yuros	181	2	181	8
Yuros	181	17	181	20
Yuros	181	22	181	24
Yuros	182	6	182	6
Yuros	182	8	182	11
Yuros	182	13	182	15
Yuros	182	17	182	18
Yuros	182	20	182	23
Yuros	183	2	183	3
Yuros	183	12	183	13
Yuros	184	8	184	13
Yuros	184	20	185	4
Yuros	185	6	185	7
Yuros	185	9	185	9
Yuros	185	11	185	13
Yuros	185	17	185	20
Yuros	185	22	185	23
Yuros	185	25	186	6

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Yuros	186	8	186	10
Yuros	186	21	186	22
Yuros	186	24	187	3
Yuros	187	5	187	5
Yuros	187	7	187	11
Yuros	187	13	187	14
Yuros	187	16	188	1
Yuros	188	20	189	7
Yuros	190	11	190	12
Yuros	190	14	190	14
Yuros	190	16	191	3
Yuros	191	8	191	10
Yuros	191	12	191	16
Yuros	191	23	192	7
Yuros	192	9	192	15
Yuros	193	19	193	21
Yuros	193	23	193	24
Yuros	194	2	194	2
Yuros	194	6	194	6
Yuros	195	25	196	1
Yuros	196	3	196	8
Yuros	196	10	196	18
Yuros	196	20	196	22
Yuros	197	8	197	11
Yuros	203	15	204	2
<i>Removing Yuros</i>	203	23	203	23
Yuros	205	13	206	13
Yuros	206	20	206	20
Yuros	206	23	206	23
Yuros	207	2	207	13
Yuros	207	15	207	16
Zhu	14	8	15	2
Zhu	87	20	121	2
<i>Removing Zhu</i>	87	21	87	21



<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
<i>Removing Zhu</i>	90	18	90	18
<i>Removing Zhu</i>	94	9	94	9
<i>Removing Zhu</i>	94	15	94	15
<i>Removing Zhu</i>	96	11	96	11
<i>Removing Zhu</i>	96	18	96	18
<i>Removing Zhu</i>	98	18	98	18
<i>Removing Zhu</i>	108	15	108	15
<i>Removing Zhu</i>	108	24	108	24
<i>Removing Zhu</i>	109	12	109	12
<i>Removing Zhu</i>	113	21	113	21
<i>Removing Zhu</i>	115	19	115	19
<i>Removing Zhu</i>	117	13	117	15
<i>Removing Zhu</i>	118	8	118	8
<i>Removing Zhu</i>	119	3	119	3
<i>Removing Zhu</i>	119	24	119	24
<i>Removing Zhu</i>	120	5	120	5
<i>Removing Zhu</i>	120	10	120	10
Zhu	121	3	121	8
Zhu	125	13	125	14
Zhu	125	16	125	22
Zhu	125	24	128	5
Zhu	133	18	134	1
Zhu	134	3	134	9
Zhu	134	11	134	14
Zhu	135	7	135	10
Zhu	135	12	135	15
Zhu	148	4	148	19
Zhu	148	12	148	19
<i>Removing Zhu</i>	148	18	148	18
Zhu	148	12	149	21
<i>Removing Zhu</i>	148	18	148	18
<i>Removing Zhu</i>	149	20	149	20
Zhu	154	13	155	6
Zhu	156	10	156	13

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Zhu	157	2	157	5
Zhu	157	7	157	19
Zhu	158	1	158	6
Zhu	158	14	158	21
Zhu	162	13	162	16
Zhu	162	18	162	18
Zhu	162	20	162	24
Zhu	164	6	166	2
<i>Removing Zhu</i>	164	8	164	10
<i>Removing Zhu</i>	164	21	164	21
Zhu	165	2	165	9
<i>Removing Zhu</i>	165	12	165	12
Zhu	175	22	176	9
Zhu	176	10	176	11
Zhu	177	13	178	8
Zhu	179	21	179	23
Zhu	180	1	180	11
Zhu	180	13	180	15
Zhu	181	15	181	23
Zhu	186	22	187	14
<i>Removing Zhu</i>	187	2	187	2
<i>Removing Zhu</i>	187	11	187	11
Zhu	190	9	193	6
<i>Removing Zhu</i>	192	4	192	4
Zhu	202	24	203	3
Zhu	204	16	204	19
Zhu	204	21	205	7
Zhu	205	9	205	11
Zhu	209	14	209	24
Zhu	210	2	210	4
Zhu	211	6	211	8
Zhu	211	11	212	13
Zhu	216	3	216	15
Zhu	221	13	222	15

<b>Deponent</b>	<b>Start Page</b>	<b>Start Line</b>	<b>End Page</b>	<b>End Line</b>
Zhu	222	18	223	2
Zhu	234	8	235	13
Zhu	228	17	229	13
<i>Removing Zhu</i>	228	20	228	20
Zhu	243	5	245	20
<i>Removing Zhu</i>	243	20	243	20
Zhu	246	12	246	21
Zhu	250	1	250	21
Zhu	250	22	251	11
Zhu	251	14	255	6
Zhu	255	8	255	9
Zhu	255	11	255	24
Zhu	256	2	256	12
Zhu	257	2	257	10
Zhu	257	13	258	13
Zhu	258	15	259	5

**APPENDIX B: OBJECTIONS TO EXHIBITS**

The objections that the Court has overruled when ruling on the motions *in limine* have been struck through. Where the Court has excluded Plaintiff's exhibit when ruling on the motions *in limine*, the exhibit number and description have been struck through.

<b>Trial Exh. No.</b>	<b>Production No(s).</b>	<b>Date</b>	<b>Description</b>	<b>Defendant Objection</b>
PTX001	N/A	06/01/2020	Complaint EDPA 20-02576-TJS Misappropriation of Trade Secrets and Breach of Contract	Hearsay (FRE 802)
PTX002	N/A	11/02/2020	<i>Excerpts from Defendants' Answers and Objections to Plaintiff's First Set of Interrogatories to Defendants</i>	Incomplete Document (FRE 106); prejudicial (FRE 403) without including other discovery responses (106, 403); excerpts not specified;
PTX003	N/A	10/18/2020	Notice of 30(b)(6) Deposition (10/18/2020)	Hearsay (FRE 802); relevance
PTX004	N/A	06/01/2020	Complaint	Hearsay (FRE 802); Redundant Document (FRE 403)
PTX005	EC-CONF-00000312	01/18/2018	Chao NDNC Agreement (01-01-18)	
PTX006	EN-AEO-1-012975	01/10/2019	Entergrid LLC OPERATING Agreement	Irrelevant (FRE 402)
PTX007	EN-AEO-1-013057	01/10/2019	Entergrid Fund I, LLC OPERATING Agreement	Irrelevant (FRE 402)
PTX008	EN-AEO-1-004057	06/01/2019	Entergrid Amended and Restated LLC Agreement	Irrelevant (FRE 402)
PTX009	EN-AEO-1-006381	01/21/2020	Jay Tian Employment Offer Letter - January 2020	Irrelevant (FRE 402)
PTX010	EN-AEO-1-006383	01/22/2020	Jay Tian Employee Proprietary Information Agreement	
PTX011	EN-AEO-1-008132	06/01/2019	Employment Agreement of Karl Petty	Irrelevant (FRE 402)
PTX012	EN-CNF-1-010212	08/23/2019	Employment Agreement Docusign Confirmation - KARL PETTY	Irrelevant (FRE 402)

PTX013	EN-AEO-1-000138	02/17/2020	Dov Quint offer letter	Irrelevant (FRE 402)
PTX014	EC-AEO-003594839	01/08/2016	KARL PETTY Elmagin Consulting Agreement	
PTX015	EN-AEO-1-006667	04/09/2019-07/03/2020	Karl Petty Notes	
PTX016	EN-CNF-1-006323	01/2020	Entergrid Employee Handbook (January 2020)	Irrelevant (FRE 402)
PTX017	EN-AEO-1-000210	10/15/????	Mat Affourtit Consulting Agreement	Irrelevant (FRE 402)
PTX018	<del>EN-AEO-1-011210</del>	<del>12/09/2019</del>	<del>Email 12/9/2019 Re: Outage Predictions</del>	<del>Hearsay (FRE 802) as to Mat Affourtit remarks</del>
PTX019	EN-AEO-1-002888	2019	2019 Tax return	
PTX020	EN-AEO-1-003420	02/06/2019	Amazand Contract Terms notes - February 6, 2019	Hearsay (FRE 802) within Hearsay (FRE 802)
PTX021	EN-AEO-1-010399	07/26/2019	Maplewell Engineering Co Proposal July 26 2019	Hearsay (FRE 802)
PTX022	EN-AEO-1-003011	2019	2019 Audited Financials	Document not included with exhibits.
PTX023	EN-AEO-1-000747	12/13/2019	Entergrid Fund I 2019 Accounting (Balance Sheet, P&L, etc.) 2019 Entergrid Fund I LLC Accounting v2 (1).xlsx	
PTX024	EN-AEO-1-000755	05/31/2021	Entergrid Fund I Accounting through 5/30/2020 2020.05.31- Entergrid Fund I LLC Accounting.xlsx	
PTX025	AT-AEO-T-006822	08-12/2020	CAISO bids and PnL - 8/28/2020 - 11/28/2020 - caiso_bids_pnl.csv	
PTX026	EN-AEO-1-000299	02/17/2019	Gryphon Strategy - February 17, 2019	
PTX027	EN-AEO-SC-000707	05/09/2019	Spot Check on Gryphon Backtest - August 9, 2019	
PTX028	EN-AEO-1-000532	02/13/2019	Target FTR to Constraint - February 13, 2019	
PTX029	EN-AEO-1-000553	07/04/2019	Universe Construction Methods - July 4, 2019	
PTX030	EN-AEO-1-000290	06/09/2019	General Historical Strategy - June 9, 2019	

PTX031	EN-AEO-SC-000612	7/2019-6/17/2019	Bids for July 2019 - June 17, 2019	
PTX032	EN-AEO-SC-000584	07/15/2019	Aug 2019 Bids - July 15, 2019	
PTX033	EN-AEO-1-000492	08/12/2019	PnL vs Clear Price in Gryphon MISO - August 12, 2019	
PTX034	EN-AEO-1-000572	05/03/2020	Vail Strategy vs. Flow Ratio Threshold	
PTX035	AT-AEO-T-006824	09/01/2019-11/01/2020	MISO FTR awards and PnL - 9/1/2019 - 11/1/2020 - miso_ftr_award_pnl.csv	
PTX036	EN-AEO-1-004310	01/30/2019	Manage Production and Development Environments - 1/30/2019	
PTX037	EN-AEO-1-000080	05/05/2020	Change Vail to Add in Production	
PTX038	EN-1-032945	12/24/2019	Slack message 12/14/2019 - Hydra uses all settlement points; Yogi using only unit LMPs	
PTX039	EN-1-022686	05/07/2020	Slack message 5/7/2020 - Hydra bids in pairs of buy and sell	
PTX040	EN-1-023114	05/18/2020	Slack message 12 05/18/2020 Ziggi bids Dayzer Price; Hydra bids historical price	
PTX041	EN-1-049168	05/18/2020	Slack message 5/18/2020 - Portfolio weighting in Hydra	
PTX042	EN-1-023117	05/18/2020	Slack message 5/18/2020 - Ziggi is net long; Hydra is net short	
PTX043	EN-AEO-SC-000598	03/04/2020	Backtest Uma on Archived Dayzer Inputs - March 4, 2020	
PTX044	EN-1-019206	03/04/2020	Slack message 3/4/2020 - All gains have come from Hydra	
PTX045	EN-AEO-1-004206	05/04/2020	FTR Bidding Process - May 7, 2020	
PTX046	EN-1-032948	12/15/2019	Slack message 12/15/2019 from chao, Ziggi is Hydra but using Dayzer	
PTX047	EN-AEO-SC-000664	02/09/2020	Model LMP with Dayzer Outputs - 2/9/2020	

PTX048	EN-1-023121	05/18/2020	Slack message 5/18/2020 - Ziggi with weighted positions	
PTX049	EN-1-017656	12/11/2019	Slack message 12/11/2019 from Chao re Xena	
PTX050	EN-AEO-1-004573	05/19/2020	MISO Jun 20 Bids - May 19, 2020	
PTX051	EN-AEO-1-000535	05/13/2020	Trade FTRs Based on Dayzer Flows	
PTX052	EN-AEO-1-006381	01/01/2018	Membership Interest Purchase and Release Agreement	
PTX053	EC-AEO-003842115	12/05/2017	Chao email 12/5/2017 - not going to run strategies run at Elmagin	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX054	EC-AEO-003766109	08/24/2017	Chao email 8/24/2017 - Faber	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX055	EN-SOURCE-005066	12/15/2016	Target Constraints - 12 Month Test	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX056	EC-AEO-003889202	10/24/2016	FTR Universe from Shift Factors	Incomplete Document (FRE 106)
PTX057	EC-AEO-003889344	06/24/2016	Breck Backtest	
PTX058	EC-AEO-003889063	03/26/2015	Chao email 3/26/2015 - simple backtest	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX059	EC-AEO-003736285	02/11/2015	Chao email 2/11/2015 - Optimal FTR Bidding	Incomplete Document (FRE 106)
PTX060	EC-AEO-003819560	03/13/2015	Chao email 3/13/2015 - to Herb Yan re: more weight on recent history?	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX061	EC-AEO-003846900	06/06/2016	Chao email 6/6/2016 - MST Question	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX062	EC-AEO-003889072	03/27/2015	Chao email 3/27/2015 - two backtests	
PTX063	EC-AEO-003578170	06/24/2016	Explain Breck Profit	
PTX064	EC-AEO-003579755	03/27/2015	Chao email 3/27/2015 - secret stuff	
PTX065	EC-CONF-00002318	01/06/2016	Petty email 1/6/2016 FTR Portfolio Value Calculator	Incomplete Document (FRE 106)

PTX066	EN- SOURCE - 004668	01/04/2016	Calculate FTR Bid Performance	
PTX067	EN- AEO -1- 067754	03/06/2019	Petty email 3/6/2019 - discussing Chao's next steps, Petty joining	
PTX068	<del>EN- AEO -1- 068002</del>	<del>03/16/2020</del>	<del>Ye Zhang email to Chao 3/16/2020 re: FTR and UTC Markets Volume Comparison</del>	Hearsay (FRE 802); Incomplete Document (FRE 106)
PTX069	<del>EN- AEO -1- 068003</del>	N/A	Notes re: PJM FTR and UTC	-
PTX070	<del>EN- AEO -1- 067985</del>	<del>07/10/2020</del>	<del>Wei Luo email to Chao 7/10/2020 - PJM FTR Available Nodes</del>	Hearsay (FRE 802)
PTX071	EN- AEO -1- 067662	04/06/2019	Chao email 4/6/2019 re: operating agreements and employment agreement	
PTX072	<del>EN- AEO -1- 070295</del>	<del>09/27/2018</del>	<del>Ted Graham email to Chao 9/27/2018 - Mexico</del>	Hearsay (FRE 802); Incomplete Document (FRE 106)
PTX073			INTENTIONALLY OMITTED	
PTX074	N/A	04/15/2021	TradeDynamix - Compliance, Trading	Hearsay (FRE 802)
PTX075			INTENTIONALLY OMITTED	
PTX076	N/A	04/13/2021	WATS Equities Electronic Trading - Wells Fargo Corporate & Investment Banking	Hearsay (FRE 802)
PTX077			INTENTIONALLY OMITTED	
PTX078	EC-AEO-003783062	12/02/2015	Tang email 12/2/2015 to Chao re: Breck	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX079	EC-AEO-003579587	01/01/2016	Tang email 1/1/2016 Breck strategy recommendations for Feb 2016	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX080	EC-AEO-003783040	12/02/2015	Yuros email to Tang 12/2/2015 - Breck Vol vs Equal Weighted Draw-downs	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX081	EC-AEO-003889368	04/05/2016	Breck on Annual Auction	Duplicate (FRE 403)
PTX082	EC-AEO-003889344	06/24/2016	Breck Backtest	
PTX083	EN-AEO-1-067648	04/11/2019	Email from Chao Chen re waneka project	
PTX084	EN-CNF-073461	01/2016	Petty notes from 1/2016	



PTX085	N/A	03/23/2021	PJM Principal - Annual Recertification FAQs	Hearsay (FRE 802)
PTX086	EN-AEO-1-006727	5/2019-11/2020	Petty to-do notes and notes on 5/2019 - 11/2020	
PTX087	EN-AEO-073433	12/31/2020	2020.12.31 Entergrid LLC- Accounting Reports	
PTX088	EN-AEO-073438	12/31/2020	2020.12.31 Entergrid Fund I Accounting	
PTX089			INTENTIONALLY OMITTED	
PTX090	N/A	N/A	Source code screenshots	
PTX091			INTENTIONALLY OMITTED	
PTX092			INTENTIONALLY OMITTED	
PTX093	EN-SOURCE-003075	10/05/2016	Chao Email 10/5/2016 Re: where a specific path was dropped	
PTX094	N/A	N/A	Jay Tian LinkedIn Screen capture	Hearsay (FRE 802)
PTX095	EN-1-024275	06/15/2020	Slack message from Chao, "not running hydra. Running Tuva instead"	Incomplete Document (FRE 106)
PTX096	EN-AEO-1-004334	07/15/2020	MISO Aug20 Bids 7/15/2020	
PTX097	EN-1-021256	04/09/2020	4/9/2020 Slack message "20 days in MISO"	
PTX098	N/A	05/10/2021	Financial Transmission Rights	Hearsay (FRE 802)
PTX099	EC-CONF-00000258- 280	03/16/2016	Elmagin Capital Handbook	Hearsay (FRE 802)
PTX100	EC-AEO-003786257-6260	01/11/2016	Email from Yuanmin Tang re Breck strategy recommendations for Feb 2016	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX101	EC-AEO-003862536	01/31/2017	Email from Matthew Yuros re FTR Profit thru 2/1	<del>Hearsay (FRE 802)</del>
PTX102	EC-AEO-003863063-3064	02/06/2017	Email from Chao Chen re FTR Profit thru 2/7	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX103	EC-AEO-003889020-9031	04/11/2017	PJM Binding Constraint Analysis	Hearsay (FRE 802)
PTX104	EN-AEO-1-003449	09/13/2019	Backtest Gryphon in PJM using Dayzer Constraints as Targets	
PTX105	EC-AEO-003889140-9158	12/07/2017	Faber update	Hearsay (FRE 802)

PTX106	EN-AEO-1-003789-3792	10/31/2019	Decompose FTR Portfolios to Constraints	
PTX107	EN-AEO-1-003465-3473	08/24/2019	Bayou Duboin Constraint, MISO Apr 9 2019	
PTX108	EN-AEO-1-004327	02/26/2019	Minimum Variance Portfolio	
PTX109	EC-AEO-003807946	02/16/2017	Email from Chao Chen re Faber Fed 2017 portfolio analysis	Hearsay (FRE 802) as to handwriting
PTX110	EN-AEO-1-004716-717	08/12/2019	Pnl vs Clear Price in Gryphon MISO	
PTX111	<del>EN-AEO-070730-733</del>	<del>07/23/2018</del>	<del>Email from Patrick de Man re investment</del>	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX112	EN-AEO-1-071995	08/16/2018	Email from Chao Chen re Hi (non-compete ending)	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX113	EN-AEO-1-011264	11/25/2019	Email from Chao Chen re generate trades that bet on outage related congestion	
PTX114	EC-AEO-003578206	N/A	Marginal Unit Panorama	Hearsay (FRE 802); Authenticity
PTX115	EC-AEO-003889209-9215	06/29/2017	MISO binding constraints contingency test	Hearsay (FRE 802)
PTX116	EC-AEO-003889140	12/07/2017	Faber update	Hearsay (FRE 802)
PTX117	N/A	05/23/2021	Pirrong: The price of power: The valuation of power – Google Scholar	Irrelevant (FRE 402); Hearsay (FRE 802)
PTX118	N/A	04/16/2013	Prof. Pirrong is Energy Expert for Wall Street Journal	Irrelevant (FRE 402); Hearsay (FRE 802)
PTX119	N/A	6/2011	Chakraborty, T. & Kearns, M., Market Making and Mean Reversion, 12th ACM Conference on Electronic Commerce, June 2011, Univ. of Penn Archive	Hearsay (FRE 802); Improper Expert Materials
PTX120	N/A	03/01/2021	Market Maker: What Is a Market Maker (MM) investopedia.com	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)

PTX121	N/A	05/21/2021	Market Maker Explained for Beginners, Warrior Trading Blog	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)
PTX122	N/A	03/18/2021	Bid-ask Spread, investopedia.com	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)
PTX123	N/A	05/21/2021	Financial Transmission Right (FTR)	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)
PTX124	N/A	05/25/2021	FAQs: Financial Transmission Rights (FTRs)	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)
PTX125	EN-AEO-1-003930-3937	03/2019	Chao Chen re: Electricity Market Clearing Mechanisms	
PTX126	EN-AEO-1-010758-0760	04/01/2019	Email from Xin Chen re Power Trading Basics – Invitation to edit	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX127	EC-AEO-003818564-8565	02/06/2015	Email from Herbert Yan re Find FTR source sink pairs that span the network	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX128	EC-AEO-003785774-5776	12/31/2015	Email from Chao Chen re decompose FTR portfolios	
PTX129	EC-SOURCE-000583- 584 EC-AEO-003578981-8994 EC-AEO-003766999-7002 EC-SOURCE-004685- 4690	06/24-30	Universe Changes Summary	Compound Document: (1) Hearsay (FRE 802); (2) Hearsay (FRE 802); Expert material by non-expert (FRE 701); Irrelevant (FRE 402) (3) No objection; (4) Hearsay (FRE 802)
PTX130	N/A	04/30/2021	Email from Charles P Goodwin re Designation of Documents and Expert Reports	Irrelevant (FRE 402); Incomplete without attachment (FRE 106); Hearsay (FRE 802) as to missing attachment
PTX131	EN-AEO-1-003799-3800	06/06/2019	Chao Chen: Diagnose PJM FTR Universe	
PTX132	N/A	1997	Main, Michael et al., Data Structures and Other Objects Using C++, pgs. 3-4, 1997	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)

PTX133	N/A	05/21/2021	College of San Mateo, Professor Contact Information, Stacey Grasso, Associate Professor	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)
PTX134	N/A	04/16/2009	Shaffer, Clifford A., A Practical Introduction to Data Structures and Algorithm Analysis Third Edition (Java)	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)
PTX135	N/A	05/24/2021	Basics of Algorithmic Trading: Concepts and Examples, investopedia.com	Hearsay (FRE 802); Improper Expert Materials; Irrelevant (FRE 402)
PTX136	EC-AEO-003579599-9607	08/16/2017	Email chain from Matthew Yuros re Farber bids Sep 2017	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX137	EC-AEO-003802092-2094	10/12/2016	Email from Kevin Gates re Chloe in PJM no prompt – using prompt universe	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX138	EC-AEO-003825456	12/21/2016	Email from Chao Chen re ideas for trading	
PTX139	EC-AEO-003579609-9618	02/05/2015	<u>Email to analysis@elmagincapital.com re FTR source sink pairs that span the network</u>	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX140	EC-AEO-003766096-6101	08/24/2017	Email from Chao Chen re Faber	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX141	EC-AEO-003820981	07/03/2015	Email from Matthew Yuros re betting on shadow prices	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX142	EC-AEO-003813543-3548	07/05/2017	Email from Yuanmin Tang re Ginger High-volume update	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX143	EC-SOURCE-000149- 154	06/08/2016	ERCOT CRR Credit Calculation, Chao Chen	
PTX144	N/A	05/24/2021	Screen Capture – IEEE Xplore, Algorithmic Trading	Hearsay (FRE 802)
PTX145	N/A	2014	Rafał Weron, Electricity price forecasting: A review of the state-of-the-art with a look into the future, International Journal of Forecasting, Vol. 30, Issue 4, 2014, pp. 1030-1081	Hearsay (FRE 802)

PTX146	N/A	2002	Xingwang Ma, D. I. Sun and A. Ott, "Implementation of the PJM financial transmission rights auction market system," IEEE Power Engineering Society Summer Meeting, 2002, Vol.3 pp. 1360-1365	Hearsay (FRE 802)
PTX147	N/A	05/25/2021	Correlation and dependence, Wikipedia	Hearsay (FRE 802)
PTX148	EC-NODES-00000338	09/30/2014	Certificate of Formation of Limited Liability Company - Elmagin Capital LLC	Irrelevant (FRE 402)
PTX149	EN-AEO-1-004916-4918	03/19/2019	Chao Chen re Power Trading Ideas	
PTX150	EN-AEO-1-006415-6448	09/30/2019 (updated 11/20/2019)	Karl Petty, A Simple PTP Strategy in ERCOT	
PTX151	EC-AEO-003889236-8949	N/A	Target Binding Constraints Elmagin Presentation	Hearsay (FRE 802) except as to handwriting
PTX152	EN-AEO-1-010824	03/11/2019	Email from Karl Petty, Re Power Market Info - March 2019	
PTX153	N/A	12/30/2020	Elmagin Responses to Second Set of Interrogatories	Hearsay (FRE 802)
PTX154	EC-AEO-003802579-2581	10/21/2016	Email from Yuanmin Tang re Breck w Chloe Overlay PJM.xlsx	<del>Hearsay (FRE 802)</del>
PTX155	EN-AEO-1-005011	06/14/2020	Chao Chen re Short Constraint Flows with FTRs	
PTX156	EN-1-020203	03/27/2020	Slack message from Chao re Hydra doesn't use dayzer	
PTX157	EN-1-020264	03/27/2020	Slack message from Chao re Hydra uses hourly data	
PTX158	EN-AEO-1-000037	09/13/2019	Chao Chen re Backtest Gryphon Using Dayzer Constraints as Targets	
PTX159	EN-AEO-1-000495	N/A	Whiteboard – Strategy descriptions	
PTX160	EN-1-023442	05/22/2020	Slack message from Chao re Vail description (bet on constraints w/ high Dayzer flow)	

PTX161	EN-AEO-1-005308-5310	07/31/2020	Dov Quint, CAISO Reggie Strategy; Samson	Hearsay (FRE 802)
PTX162	EN-AEO-1-005002-5003	07/21/2020	Chao Chen and Dov Quint, Samson	
PTX163	EN-AEO-1-000437-442	05/19/2020	Chao Chen re TUVA - MISO Bids	
PTX164	EN-1-018910	02/18/2020	Slack message from Chao, - This is my Winston Strategy	
PTX165	EN-AEO-1-067769-771	02/08/2018	Email from Chao Chen re Hi! Do you want to start company	
PTX166	EC-AEO-003876268-6270	12/27/2017	Email from Rich Gates re Non-Compete	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX167	EN-AEO-1-070914- 70917	04/05/2018	Email from Nick Shaffer re SaaS Abstr -Chao declines job offer due to noncompete	
PTX168	EN-AEO-1-005484-5495	06/03/2019-12/31/2019	Entergrid Fund I LLC Financial Statements - June-Dec 2019	
PTX169	EN-AEO-073506	N/A	month strategies	
PTX170	EN-AEO-1-009382-9392	05/14/2020	Letter to Karl Petty from Steven Soles re Elmagin Capital LLC Consulting Agreement	Hearsay (FRE 802)
PTX171	EN-AEO-1-009394-9405	05/14/2020	Soles Notice Letter to Chen	Hearsay (FRE 802)
PTX172	EN-AEO-1-000182-0209	01/10/2019	PROPOSED Entergrid LLC Original LLC Agreement	
PTX173	EN-AEO-1-011191-1199	02/24/2020	Entergrid Fund I LLC Member Agreement in CAISO	
PTX174	EN-CNF-1-001149-1162	02/05/2019	Entergrid Fund I LLC - ERCOT Market Participant Agreement	
PTX175	EN-AEO-1-010251-0256	06/01/2019	Karl Petty - EGRD Restricted Units Agreement 200K units for Cash	
PTX176	EN-AEO-1-010257- 10262	06/01/2021	EGRD Restricted Units Agreement Karl Petty 200K for Continued Employment	
PTX177	EN-CNF-1-006724	01/10/2019	Entergrid LLC application for articles of organization	

PTX178	EN-CNF-1-003539- 003542	04/22/2020	Entergrid Fund I LLC - Colorado Articles of Organization filing certificate	
PTX179	EN-AEO-1-000229-0230	04/06/2019	Chao Chen re Entergrid Operating Agreement - Ownership Notes re Karl Petty Ownership 4/6/19	
PTX180	EN-AEO-1-003925	01/18/2019	Chen/Moriarty Trust EFI Subscription \$1 million	
PTX181	EN-AEO-1-003926	01/18/2019	Entergrid EFI Subscription \$50K	
PTX182	EN-AEO-1-004010	02/26/2019	Chen EFI Subscription \$750K	
PTX183	EN-AEO-1-004045	01/18/2019	Chen/Moriarty Trust EFI Subscription \$150K	
PTX184	EN-AEO-1-003238-3253	09/25/2019	Administration Agreement - Fleming Financial Services	relevance
PTX185	EN-AEO-1-003254-3259	11/12/2019	Agreement for Consulting Services - Fleming Financial Services	relevance
PTX186	AT-AEO-T-006823	02-09/2020	ercot_bids	
PTX187	AT-AEO-T-006825	9/2019-11/2020	pjmiso_ftr_award_pnl	
PTX188	EN-SOURCE-004647	N/A	Chao Instagram	Incomplete Document (FRE 106)
PTX189	EN-AEO-SC-000653- 663	09/09/2019	Chao Chen re FTR Bid Process	Highlighting appears in-authentic.
PTX190	EN-AEO1-000471-485	N/A	PJM Feb. 2020 Bids	
PTX191	EN-1-017733	12/16/2019	Slack message – from Chao re yogi bid price distribution	
PTX192	N/A	03/30/2021	Expert Report of Dr. Craig Pirrong	Hearsay (FRE 802); portions already excluded by court.
PTX193	EC-AEO-003891420.PTX	05/25/2020	Matthew Yuros, EGRD Trading Overview	Hearsay (FRE 802); expert material by non-expert (FRE 701); Irrelevant (FRE 402)
PTX194	Hearsay (FRE 802) as to all remarks not by Dr. Chen		Matthew Yuros, EGRD Trading Overview	Hearsay (FRE 802); expert material by non-expert (FRE 701); Irrelevant (FRE 402)

PTX195	EC-AEO-003891417		Matthew Yuros, EGRD Trading Overview	Hearsay (FRE 802); expert material by non-expert (FRE 701); Irrelevant (FRE 402)
PTX196	EC-AEO-003891419		Matthew Yuros, EGRD Trading Overview	Hearsay (FRE 802); expert material by non-expert (FRE 701); Irrelevant (FRE 402)
PTX197	EC-AEO-003578170-8182	03/10/2015	Chao Chen re Predict Target Allocation	
PTX198	EC-AEO-003579587-9591	01/01/2016	Email from Yuanmin Tang, Breck strategy recommendations for Feb 2016	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX199	EC-AEO-003579608	05/10/2015	Email from Chao Chen rebids this month	
PTX200	EC-AEO-003579609-9618	02/05/2015	Email from Chao Chen re Find FTR source sink pairs that span the network	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX201	EC-AEO-003579630	03/27/2015	Email from Chao Chen re secret stuff re "Breck"	
PTX202	EC-AEO-003579631-9638	03/26/2015	Email from Chao Chen re simple backtest	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX203	EC-AEO-003579639-9644	03/27/2015	Email form Chao Chen re two backtests	
PTX204	EC-AEO-003579645-9649	09/30/2016	Email from Ying Wu, where a specific path was dropped	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX205	EC-AEO-003579672-9673	03/10/2015	Chao Chen re Predict Target Allocation	
PTX206	EC-AEO-003707623	06/18/2015	Email form Chao Chen re Alternative to MST	
PTX207	EC-AEO-003579708-9711	02/09/2015	Email from Chao Chen re Find FTR source sink pairs that span network	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX208	EC-AEO-003668673-8677	08/24/2017	Email from Chao Chen re: Faber	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX209	EC-AEO-003734465-4466	04/04/2016	Email from Chao Chen re: plaining 2016	



PTX210	EC-AEO-003819826-9831	03/27/2015	Email from Matthew Yuros re: simple backtest	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX211	EC-AEO-003820976-0977	07/01/2015	Email from Chao Chen re Breck Strategy Updates	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX212	EC-AEO-003854092-4096	10/05/2016	Email from Chao Chen re: where a specific path was dropped	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX213	EC-AEO-003889063-9070	03/26/2015	Email from Chao Chen re: simple backtest	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX214	EC-AEO-003889079-9080	04/05/2016	Chao Chen re: Breck on Annual Auction	
PTX215	EC-AEO-003889287-9301	09/25/2020	Entergrid LLC and Its Affiliated Funds Trading Overview	Hearsay (FRE 802); expert material by non-expert; Irrelevant (FRE 402)
PTX216	EC-AEO-003890414	01/2021	Barton Fund LLC	Hearsay (FRE 802)
PTX217	EC-AEO-003890415	01/2021	Elmagin Power Fund LLC	Hearsay (FRE 802)
PTX218	EC-AEO-003890416	01/2021	Elmiso LLC	Hearsay (FRE 802)
PTX219	EC-CONF-00000705- 710	03/15/2016	Consulting Agreement between Elmagin and OZ Intelligence, INC.	Hearsay (FRE 802); Irrelevant (FRE 402)
PTX220	EC-CONF-00000806- 811	06/17/2016	Consulting Agreement between Elmagin and Wen Yuan Tang	Hearsay (FRE 802)
PTX221	EC-CONF-00000989	10/25/2017	Email from Steven Soles re: Signed Employment Agreement _William Blankson	<del>Hearsay (FRE 802)</del>
PTX222	EC-SOURCE-004681- 684	07/09/2015	Chao Chen re: Bet on Shadow Prices Didn't work (redacted)	
PTX223	EN-1-015722		Slack message from Chao re: ERCOT	Irrelevant (FRE 402)
PTX224	EN-1-015723	09/05/2019	Slack message from Petty re: Good	Irrelevant (FRE 402)
PTX225	EN-1-015724	09/05/2019	Slack message from Chao re: Good	Irrelevant (FRE 402)
PTX226	EN-1-015725	09/05/2019	Slack message from Petty re: first thing worked	Irrelevant (FRE 402)
PTX227	EN-1-015726	09/05/2019	Slack message from Petty re: everybody doing same	Irrelevant (FRE 402)

PTX228	EN-1-015727	09/05/2019	Slack message from Chao re: normal market	Irrelevant (FRE 402)
PTX229	EN-1-015728	09/05/2019	Slack message from Chao re: other people	Irrelevant (FRE 402)
PTX230	EN-1-015729	09/05/2019	Slack message from Chao re: similar	Irrelevant (FRE 402)
PTX231	EN-1-015730	09/05/2019	Slack message from Chao re: make money	Irrelevant (FRE 402)
PTX232	EN-1-015731	09/05/2019	Slack message from Petty re: suspicious	Irrelevant (FRE 402)
PTX233	EN-1-016230	09/20/2019	Slack message from Chao re: Entergrid making lots of money	Irrelevant (FRE 402)
PTX234	EN-1-017767	12/17/2019	Slack message from Chao re: here's hydra	
PTX235	EN-1-023113	05/18/2020	Slack message from Chao re: MISO bids	
PTX236	EN-1-062714	06/12/2020	Slack message from Jay re: bid constraints	Hearsay (FRE 802)
PTX237	EN-1-062715	06/12/2020	Slack message from jay re: flow variance	Hearsay (FRE 802)
PTX238	EN-AEO-073436	06/2019-12/2020	Entergrid Fund LLS Member Allocations	
PTX239	EN-AEO-073450	06/2019-01/2021	Entergrid Fund LLS Member Allocations	
PTX240	EN-AEO-073452	01/31/2021	Entergrid Fund LLC Balance Sheet	
PTX241	EN-AEO-1-000272-274	01/15/2019	Chao Chen FTR Participant Profitability	
PTX242	EN-AEO-1-000279-282	08/05/2019	Chao Chen FTR Universe Construction Using Similar Volatilities	
PTX243	EN-AEO-1-000444-446	04/03/2020	Chao Chen Model DA RT with Dayzer	
PTX244	EN-AEO-1-000530-531	06/16/2020	Chao Chen Target Constraint with FTR Portfolio	
PTX245	EN-AEO-1-000535-542	05/13/2020	Chao Chen Trade FTRs Based On Dayzer Flows	
PTX246	EN-AEO-1-000577-580	02/21/2020	Chao Chen Winston Backtest	
PTX247	EN-AEO-1-004274	06/22/2020	Chao Chen How to handle wind prediction error	

PTX248	EN-AEO-1-007008	05/19/2020	Email from Trello re: Chao Chen commented on the card Vail	
PTX249	EN-AEO-1-068049-8053	02/25/2019	Chao Chen Entergrid FTR Risk Policy	
PTX250	EN-SC-002130-2135	02/09/2020	Chao Chen Model LMP with Dayzer Outputs	
PTX251	EC-AEO-003889283-9286	04/12/2016	Chao Chen Vienna-Crisfield FTR Clearing Price and Actual Congestion, 2015-2016 Annual PJM Auction	
PTX252	EN-1-017713	12/15/2019	(Ziggi/Hydra comparison)	
PTX253	EC-003891418	04/30/2015	Hooper Agreement	
PTX254	EC-CONF-000002819-2822	02/20/2017	Services Agreement between TFS Capital LLC and Elmagin Capital LLC	
PTX255	EC-CONF-000002816-2818	06/05/2019	Services Agreement between Elmagin Capital LLC and between TFS Capital LLC	
PTX256	EC-AEO-003626720	12/2017	At-Will Employment Agreement Yu-anmin Tang	
PTX257	EC-AEO-003746421	02/24/2016	At-Will Employment Agreement Yinghua Wu	
PTX258	EC-AEO-003765552	08/14/2017	Email from Chao Chen re: Power Trading Risk and Rewards – Invitation to edit	
PTX259	EC-AEO-003765075	07/31/2017	Email from Kevin Gates re Berkeley Trip	
PTX260	EC-AEO-003757084-7096	01/31/2016	Elmagin Power Fund LLC	Hearsay (FRE 802)
PTX261	EC-AEO-003578731-8764	2017	Elmagin Capital LLC Q3 2017	Hearsay (FRE 802)
PTX262	EC-AEO-003804885-4887	12/21/2016	Email from Guidong Zhu re Ideas for Trading	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX263	EN-CNF-1-073143-3174	01/18/2018	Email from Chao Chen re: Draft SPA and NDNC	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX264	EN-CNF-1-073218	01/26/2018	Email from Chao Chen re: Purchase Agt and Non- Disclosure/Non-Compete Agt	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>

PTX265	EN-CNF-1-073281	01/16/2018	Email from Chao Chen re: Draft SPA and NDNC	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX266	EC-AEO-003891033-1111	03/11/2018	Elmagin Capital LLC – Limited Research Tax Credit Study for Startup Payroll Tax Offset	Hearsay (FRE 802); Irrelevant (FRE 402)
PTX267	EC-AEO-003891158-1248	03/09/2019	Elmagin Capital LLC – Research Tax Credit Study for Startup Payroll Tax Offset	Hearsay (FRE 802); Irrelevant (FRE 402)
PTX268	EC-AEO-003891271	02/22/2020	Elmagin Capital LLC – Research Tax Credit Study for Start	Hearsay (FRE 802); Irrelevant (FRE 402)
PTX269	EC-AEO-003578786	10/2017	Elmiso Oct 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX270	EC-AEO-003578792	12/2017	Elmagin Dec 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX271	EC-AEO-003578796	09/2017	Elmagin Sept. 2017- No BBG	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX272	EC-AEO-003579336	11/2017	Elmiso Nov 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX273	EC-AEO-003579338	09/2017	Elmiso Sept 2017- 20171025 revision	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX274	EC-AEO-003579344	11/2017	Elmagin Nov 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX275	EC-AEO-003579346	09/2017	Elmagin Sept 2017- 20171120 revision	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX276	EC-AEO-003649679	01/2017	Elmagin Jan 2017	Hearsay (FRE 802)

PTX277	EC-AEO-003650175	02/2017	Elmagin Feb 2017	Hearsay (FRE 802)
PTX278	EC-AEO-003650429	04/2017	Elmagin Apr 2017	Hearsay (FRE 802)
PTX279	EC-AEO-003650773	05/2017	Elmagin May 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX280	EC-AEO-003680592	04/2017	Elmagin April 2017	Hearsay (FRE 802)
PTX281	EC-AEO-003690504	08/2017	Elmiso Aug 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX282	EC-AEO-003690505	08/2017	Elmagin Aug 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX283	EC-AEO-003698037	10/2017	Elmiso Oct 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX284	EC-AEO-003698038	10/2017	Elmagin Oct 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX285	EC-AEO-003754795	12/2016	Elmagin Dec 2016	Hearsay (FRE 802)
PTX286	EC-AEO-003756055	03/2017	Elmagin Mar 2017	Hearsay (FRE 802)
PTX287	EC-AEO-003757647	06/2017	Elmagin Jun 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX288	EC-AEO-003758123	07/2017	Elmagin July 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks
PTX289	EC-AEO-003758124	07/2017	Elmiso July 2017	Hearsay (FRE 802); prejudicial (FRE 403) to the extent containing inappropriate benchmarks

PTX290	N/A	10/15/2020	Plaintiff Elmagin Capital, LLC's First Responses to Defendants' First Set of Interrogatories	Hearsay (FRE 802)
PTX291	N/A	10/15/2020	Plaintiff Elmagin Capital, LLC's Highly Confidential – Attorneys' Eyes Only Second Responses to Defendants' First Set of Interrogatories	Hearsay (FRE 802)
PTX292	N/A	12/30/2020	Plaintiff Elmagin Capital, LLC's Responses to Defendants' Second Set of Interrogatories	Hearsay (FRE 802)
PTX293	N/A	01/08/2021	Plaintiff Elmagin Capital, LLC's Supplemental Responses to Defendants' Second Set of Interrogatories	Hearsay (FRE 802)
PTX294	N/A	04/27/2021	Plaintiff Elmagin Capital, LLC's Responses to Defendants' Third Set of Interrogatories	Hearsay (FRE 802)
PTX295	EC-AEO-003703720	01/13/2015	Email from Gregory Krajnik re Elmagin NDA	<del>Hearsay (FRE 802)</del>
PTX296	EC-AEO-003712400		Matthew M. Yuros – Elmagin Capital Employment Proposal	Hearsay (FRE 802)
PTX297	EC-AEO-003719852	12/23/2014	Email from Steven Soles re American Power Net Inquiry	<del>Hearsay (FRE 802)</del>
PTX298	EC-AEO-003889059-9062	03/13/2015	Email from Chao Chen re Put more weight on recent history	
PTX299	N/A	11/11/2020	Excerpts from Defendants' Supplemental Answers and Objections to Plaintiff's First Set of Interrogatories to Defendants	Incomplete Document (FRE 106)
PTX300	N/A	11/30/2020	<i>Excerpts from</i> Defendants' Amended, Supplemented and Restated Answers and Objections to Plaintiff's First Set of Interrogatories to Defendants	Incomplete Document (FRE 106)
PTX301	N/A	04/26/2021	<i>Excerpts from</i> Defendants' Responses and Objections to Plaintiff's Second Set of Interrogatories to Defendants	Incomplete Document (FRE 106)

PTX302	N/A	04/27/2021	<i>Excerpts from</i> Defendants' Amended, Supplemented and Restated Answers and Objections to Plaintiff's First Set of Interrogatories to Defendants	Incomplete Document (FRE 106)
PTX303	EC-AEO-003593914-916		Slack message between Chen, Yuros and Gates	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX304	EC-AEO-003740754-755	08/24/2015	Email from Chao Chen re Berkeley visit	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX305	EC-AEO-003786037-038	01/06/2016	Email from Chao Chen re contractor	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX306	EC-AEO-003786255-	01/11/2016	Email from Chao Chen re asw console	Hearsay (FRE 802) as to all remarks not by Dr. Chen
PTX307	EC-AEO-003578033-8056	03/09/2017	Elmagin Capital – Detailed Look at Elmagin Power Fund's January exposure	Hearsay (FRE 802)
PTX308	EC-AEO-003727987-7999	09/30/2015	Email from Chao Chen re plans for dayzer	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX309	EC-AEO-003748853	04/12/2016	Email from Chao Chen re UTC initial look	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX310	EC-AEO-003758985	09/14/2017	Email from Chao Chen re AUM for bidding	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX311	EC-AEO-003797905-7908	07/05/2016	Email from Chao Chen re FTR Profit thru 7/5	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>
PTX312	EC-AEO-003835160-5162	08/14/2017	Email from Chao Chen re Power Trading Risk and Rewards – Invitation to edit	<del>Hearsay (FRE 802) as to all remarks not by Dr. Chen</del>

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record are being served with a copy of this document via filing on ECF/PACER on April 6, 2022.

/s/ Nicole D. Galli

Nicole D. Galli